

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Robertson, Anschutz &amp; Schneid, P.L.</b> 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number: 561-241-6901 Attorneys For Secured Creditor	CASE NO.: 17-16194-CMG  CHAPTER 13
MIRIAM J. ROSENBLATT (MR 7505)	<b>Objection to Confirmation of Debtor's Chapter 13 Plan</b>
<b>In Re:</b>  <b>Victoria A. Mowery</b>  <b>Debtor.</b>	

**OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ASSET SECURITIES CORPORATION, STRUCTURED ASSET INVESTMENT LOAN TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2005-HE1 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 2), and states as follows:

1. Debtor, Victoria A. Mowery, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on March 29, 2017.
2. Secured Creditor holds a security interest in the Debtor's real property located at 230 MEANY RD, WRIGHTSTOWN, NJ 08562-1614, WRIGHTSTOWN, NJ 08562, by virtue of a Mortgage recorded on April 22, 2005 at Instrument number 4149355 of the Public Records of Burlington County, NJ. Said Mortgage secures a Note in the amount of \$55,995.00.
3. The Debtor filed a Chapter 13 Plan on March 29, 2017.
4. Secured Creditor objects to Debtor's Plan as the loan matures on April 1, 2020 during the pendency of Plan, and the Plan does not adequately address treatment of Secured Creditor's loan. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. § 1325(a)(5) and cannot be confirmed. Secured Creditor objects to the Plan and to

any Plan which does not appropriately provide for the full payoff of Secured Creditor's claim in the amount of \$24,714.31 at the contractual interest rate of 8.515%.

**WHEREFORE**, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

**Robertson, Anschutz & Schneid, P.L.**  
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Boca Raton, FL 33487  
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By: /s/ Miriam J. Rosenblatt  
MIRIAM J. ROSENBLATT, Esquire  
NJ Bar Number: MR 7505

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<b>Robertson, Anschutz &amp; Schneid, P.L.</b> 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number: 561-241-6901 Attorneys For Secured Creditor  MIRIAM J. ROSENBLATT (MR 7505)	CASE NO.: 17-16194-CMG  CHAPTER 13  <b>Objection to Confirmation of Debtor's Chapter 13 Plan</b>
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<b>Debtor.</b>	

**CERTIFICATION OF SERVICE**

1. I, MIRIAM J. ROSENBLATT, represent U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR STRUCTURED ASSET SECURITIES CORPORATION, STRUCTURED ASSET INVESTMENT LOAN TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2005-HE1 in this matter.
2. On 4/24/2017, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below: OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

4/24/2017

**Robertson, Anschutz & Schneid, P.L.**  
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By: /s/ Miriam J. Rosenblatt  
MIRIAM J. ROSENBLATT, Esquire  
NJ Bar Number: MR 7505

<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Lee Martin Perlman Attorney for Victoria A. Mowery 1926 Greentree Road Suite 100 Cherry Hill, NJ 08003	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)
Victoria A. Mowery 281 Jacobstown New Egypt Rd Wrightstown, NJ 08562	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)
U.S. Trustee. US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other
		(as authorized by the court*)